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6 Attorney for Defendant George McKenna

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 * * *

10)
11 UNITED STATES OF AMERICA)

12 Plaintiff,)

13 vs.)

14 JACOB VILLANUEVA, JR. et al.,)

15 Defendants.)

CASE NO.: 2:12-CR-0082

16 DEFENDANT GEORGE MCKENNA'S
17 UNOPPOSED MOTION TO CONDUCT
18 A PRE-PLEA PRESENTENCING
INVESTIGATION REPORT AND
PROPOSED ORDER

19 Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a
20 Pre-Plea Presentence Investigation Report be prepared by the Probation Department.

21 1) It appears that defendant may be subject to substantially different sentencing ranges
22 depending upon his verified criminal history as well as other factors surrounding his offense
23 and plea. Defendant McKenna's decision regarding how to proceed may be drastically
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1 impacted by his sentencing exposure in this regard. The pre-plea presentence report will
2 promote judicial economy and aid in the manner in which this case is ultimately resolved.

3 2) Undersigned counsel therefore respectfully requests an order that the Department of
4 Probation conduct a pre-plea presentence investigation report as soon as possible.
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6 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney
7 Kimberly Frayn regarding this request and she has no opposition.
8

9 DATED this 10th day of July, 2012.
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11

12 /s/Philip H. Brown
13 PHILIP H. BROWN, ESQ.
14 200 HOOVER AVE, SUITE #130
15 LAS VEGAS, NEVADA 89101
16 ATTORNEY FOR THE DEFENDANT
17 GEORGE McKENNA
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7 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

8 * * *

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11 Plaintiff,)

12 vs.)

13 JACOB VILLANUEVA, et. al.,)

14 Defendants.)
15)
16)
17)

CASE NO.: 2:12-CR-0082

ORDER GRANTING DEFENDANT
GEORGE McKENNA'S UNOPPOSED
MOTION FOR PRE-PLEA
PRESENTENCING INVESTIGATION
REPORT

18 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence
19 Investigation Report on Defendant George McKenna.

20 DATED this the 11th
21 day of July, 2012.

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24 
25 U.S. DISTRICT JUDGE
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of Brown Law Offices, Chartered, and is a person of such age and discretion as to be competent to serve papers.

That on July 10, 2012, she served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT by electronic service (ECF) to the person named below:

DANIEL BOGDON
United States Attorney

KIMBERLY FRAYN
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, NV 89101

/s/ Mary D. Brown

Employee of Brown Law Offices, Chartered